

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

JOSEPH J. PLUMERI II,

Civil Case No.: 1:19-cv-05896-FB-RER

Plaintiff,

v.

**RENEWED APPLICATION TO CLERK
FOR ENTRY OF DEFAULT**

STEVEN B. BARGER,

Defendant.

TO: DOUGLAS C. PALMER, CLERK
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Plaintiff Joseph J. Plumeri II hereby renews its previous application for entry of default against Defendant Steven B. Barger for failure to plead or otherwise defend the above-captioned action pursuant to Rule 55(a) of the Federal Rules of Civil Procedure and Local Civil Rule 55.1 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. The grounds in support of this Application fully appear from the Court file and from the attached Supplemental Affidavit of Gary B. Eidelman, counsel for Plaintiff.

Dated: February 4, 2020

Respectfully submitted,

SAUL EWING ARNSTEIN & LEHR LLP

/s/ Gary B. Eidelman

Gary B. Eidelman

Gary B. Eidelman (admitted *pro hac vice*)
Michael P. Cianfichi (admitted *pro hac vice*)
500 E Pratt Street
Baltimore, Maryland 21202
(410) 332-8975
gary.eidelman@saul.com

Gillian A. Cooper
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, Pennsylvania 19102
(215) 972-7861
gillian.cooper@saul.com

New York Office
1270 Avenue of the Americas, Suite 2005
New York, New York 10020

Counsel for Plaintiff Joseph J. Plumeri II